

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

litigation risks faced by the parties; (4) whether the settlement agreement is the product of arm's-length bargaining between experienced counsel; and (4) the possibility of fraud or collusion" and any structural issues such as the opt-in/opt-out process's compliance with the FLSA. *Morris*, 2020 WL 2115347, at \*1-2 (citing *Wolinsky v. Scholastic Inc.*, 900 F. Supp. 2d 332, 335 (S.D.N.Y. 2012)); *see also Douglas*, 371 F. Supp. 3d at 82-83 (denying preliminary approval of an FLSA settlement because the settlement did not comply with *Cheeks/Wolinsky*). The parties are directed to submit a supplemental memorandum of law addressing *Cheeks* by **June 19, 2020**.

**SO ORDERED.**

Dated: June 3, 2020  
New York, New York

s/ Ona T. Wang

**Ona T. Wang**  
United States Magistrate Judge